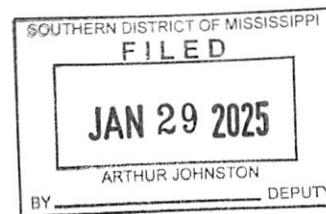


IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



EDWARD STEWART

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:25-cv-24 HSO-BWR

SILVER SLIPPER CASINO VENTURE LLC
D/B/A FULL HOUSE RESORTS LLC

DEFENDANTS

(COMPLAINT FOR EMPLOYMENT RACE DISCRIMINATION)

INTRODUCTION

1. Plaintiff, Edward L. Stewart proceeding Pro Se, brings this action pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S. Code § 2000e. et seq, and 42 U.S. Code § 1981 a. Plaintiff Contends that James Stanfield (White Security Manager) and Beverly Hall (White Human Resources Director) discriminated against him (African-American) because of his race by terminating his employment with the Silver Slipper Casino over text messages that were shared with another employee in the security department, Nancie Bullock (White), claiming sexual harassment albeit Ms. Bullock not only initiated the text messaging by phone while she was on the company's time, however, Mr. Stewart was not on the company's time. Plaintiff further asserts that both Mr. Stanfield and Ms. Hall were aware of the sexual harassment complaints that were made by multiple female security officers on the grave shift (11pm-7am) of Similarly Situated Security Assistant Shift Supervisor in training William Skipper (White), which is confirmed by documented text messages from *Security Shift Supervisor Stephanie Luck* on *Monday, September 16, 2024 at 7:53pm.*, however, Mr. Skipper or Ms. Bullock were not terminated for their

actions. Finally, Mr. Stewart was terminated from his employment under the pretext that he was performing unsatisfactory within his (90) ninety days.

JURISDICTION

2. This Court has jurisdiction over the subject matter of this civil action pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S. Code § 2000e. et seq.

PARTIES

3. Plaintiff, Edward L. Stewart, an African - American Male who is at least 52-years old, is a citizen of the United States and a resident of the State of Mississippi. At all times relevant to this suit until his termination in September 2024. Mr. Stewart was employed with Silver Slipper Casino Venture (LLC) as a Security Assistant Shift Supervisor.
4. Defendant, Silver Slipper Casino Venture LLC, is a citizen of the United States and a resident of the State of Mississippi. James Stanfield is currently the Security Risk Manager at the Silver Slipper Casino. Beverly Hall is currently the Human Resources Manager at the Silver Slipper Casino.

STATEMENT OF FACTS

5. Plaintiff Edward L. Stewart, black male, was a career Security Assistant Supervisor with over thirty years of experience and never once counseled or reprimanded with any form of disciplinary action from Mr. Stanfield or his immediate Security Shift Supervisor Stephanie Luck.
6. On 7/12/2024 Mr. Stewart was selected for employment as a Security Assistant Shift Supervisor for the day shift (7am-3pm) with the Silver Slipper Casino.
7. On Monday 9/16/2024, it was a request for Mr. Stewart to report to human resources by Security Manager James Stanfield.

8. While in the human resources office, Mr. Stewart spoke with representative Cristin Morgan (White). Ms. Morgan stated that Mr. Stewart was being investigated for an alleged sexual harassment complaint towards another security employee Nancie Bullock (White), through text messaging by (Via) cellphone that began on or around 8/11/2024.
9. Mr. Stewart explained to Ms. Morgan that he was off duty and off the clock when the text messages occurred and the messages were not unwanted or unwelcomed to support a sexual harassment claim under Title VII, please *see Barnes v. Costle*, 561 F.2d 983,999, 14 EPD 7755 (D.C. Cir. 1977) and *Henson v. City of Dundee*, 682 F.2d at 903., because the text messages were mutual, however, Ms. Bullock (White) was allowed to continue her employment without interruptions.
10. After meeting with Ms. Morgan and Ms. Hall, Mr. Stewart was told that he was going to be Suspended pending investigation.
11. On or around 9/20/2024, Mr. Stewart was notified that he was being terminated for performing unsatisfactory within his ninety (90) days.
12. Mr. Stanfield and Ms. Hall were aware of the sexual harassment complaints that were made by multiple female security officers on the grave shift (11pm-7am) of Similarly Situated Security Assistant Shift Supervisor in training William Skipper (White), however, Mr. Skipper and Ms. Bullock were not terminated for their actions.
13. On or around 9/20/2024, Mr. Stewart filed a complaint of Employment Race Discrimination with the U.S. Equal Employment Opportunity Commission against the Silver Slipper Casino Venture LLC.
14. On or around 10/31/2024, Mr. Stewart received the Determination and Notice of Rights to Sue, to pursue this civil matter further in federal court. A copy of the Notice of Rights to Sue is disclosed with this complaint.

**(RACIAL DISCRIMINATION IN VIOLATION OF TITLE VII OF THE CIVIL
RIGHTS ACT OF 1964, 42 U.S.C 2000e. et seq.)**

15. The foregoing paragraphs are realleged and incorporated by reference herein.
16. The Defendant's conduct as alleged at length herein constitutes discrimination based on race in violation of Title VII. The stated reasons for the Defendant's conduct were not the true reasons, but instead, were pretext to hide the Defendant's discriminatory animus.

PRAYER FOR RELIEF

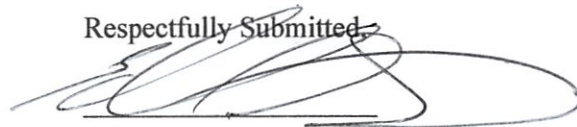
WHEREFORE, the Plaintiff requests that the court award him:

- (a) All back pay and benefits.
- (b) The sum of \$ 300,000.00 in compensatory damages (actual and general), suffered because of discrimination and
- (c) Other damages and further relief as deemed just.

JURY DEMAND

The Plaintiff requests trial by jury.

Respectfully Submitted,



Edward L. Stewart

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